## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

DENISE K. WATSON

Plaintiff

VS.

CIVIL ACTION NO.: 3:10-CV-174(HEH)

UNITED CONSUMERS, INC.

Defendant

## DECLARATION OF JESSICA T. FORD IN SUPPORT OF DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

I, Jessica T. Ford, declare:

- 1. I am the Assistant Vice President for Defendant United Consumers, Inc.
- 2. If called upon to testify, I could and would competently testify to the matters contained herein based upon my personal knowledge.
- 3. On or about October 1, 2002, United Consumers, Inc. and Commonwealth Radiology, P.C. entered into a contract whereby United Consumers, Inc. was retained to collect past due accounts on behalf of Commonwealth Radiology.
- 4. Pursuant to that contract, Commonwealth Radiology, P.C. referred Denise Watson's past due account to United Consumers, Inc. for collection in early December, 2009.
- 5. As part of its collection process, on or about December 7, 2009, United Consumers, Inc. mailed a collection notice to Denise Watson, a true and correct copy of which is attached to the Complaint in this action as Exhibit E.
- 6. On December 11, 2009, United Consumers, Inc., immediately upon being informed of Ms. Watson's Bankruptcy Discharge, closed its collection file and ceased further collection attempts on Ms. Watson's account.

I declare under the penalty of perjury and the laws of the United States of America that the foregoing is true and correct. This Declaration is executed this 18 day of May, 2010 at woolbing, Virginia.

Date: 5/18/10 Jessie 1. Frad

Jessica T. Ford